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November 2, 2007

Catherine M. Hilke  
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**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: **Ex Parte Notice**  
IB Docket No. 02-364

Dear Ms. Dortch:

On November 1, 2007, Tyrone Brown, Vice Chairman of Iridium Satellite LLC ("Iridium") and Richard Wiley and Gregg Elias of Wiley Rein LLP met with Commissioner Robert McDowell and his legal advisor, Angela Giancarlo. In this meeting, we discussed the relevant issues in this docket, consistent with Iridium's previous positions and ex parte filings, and the various documents attached hereto. Please contact the undersigned with any questions.

Sincerely,

/s/ *Catherine M. Hilke*

Catherine M. Hilke

cc: Commissioner Robert M. McDowell  
Angela Giancarlo

Attachment

# Current Big LEO Band Plan

## 1.6 GHz Band

**Globalstar Uplink**  
(8.25 MHz)

**Shared  
Spectrum**  
(3.1 MHz)

**Iridium  
Uplink/Downlink**  
(5.15 MHz)

1610 MHz

1618.25 MHz 1621.35 MHz

1626.5 MHz

## 2.4 GHz Band

**Globalstar Downlink**  
(11.5 MHz)

**BRS/MSS Spectrum**  
(5 MHz)

2483.5 MHz

2495 MHz

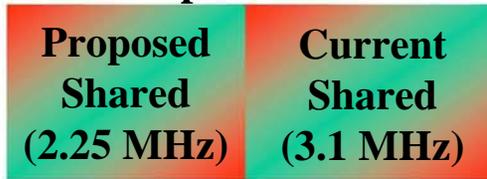
2500 MHz

# Proposed Big LEO Band Plan

## 1.6 GHz Band

**Globalstar Uplink  
(6 MHz)**

**Shared  
Spectrum**



**Iridium  
Uplink/Downlink  
(5.15 MHz)**

Globalstar ATC Authority 1610-1615.5 MHz

**1610 MHz**

**1616 MHz**

**1618.25 MHz**

**1621.35 MHz**

**1626.5 MHz**

## 2.4 GHz Band

**Globalstar Downlink  
(11.5 MHz)**

**BRS/MSS Spectrum  
(5 MHz)**

Globalstar ATC Authority 2487.5-2493 MHz

**2483.5 MHz**

**2495 MHz**

**2500 MHz**

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, DC 20549

FORM 10-K

ANNUAL REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES  
EXCHANGE ACT OF 1934

For the fiscal year ended December 31, 2006

OR

TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES  
EXCHANGE ACT OF 1934

For the transition period from \_\_\_\_\_ to  
Commission File Number 001-33117

**GLOBALSTAR, INC.**

(Exact name of Registrant as specified in its charter)

**Delaware**  
(State of other jurisdiction of  
Incorporation or organization)

**41-2116508**  
(I.R.S. Employer  
Identification No.)

**461 South Milpitas Blvd.**  
**Milpitas, California 95035**  
(Address of principal executive offices)

Registrant's telephone number, including area code: (408) 933-4000

Securities registered pursuant to Section 12(b) of the Act:

<u>Title of Each Class</u>	<u>Name of Each Exchange on Which Registered</u>
Common Stock, \$.0001 par value	The NASDAQ Stock Market

Securities registered pursuant to Section 12(g) of the Act:

None

In the early 2006, we undertook a comprehensive third party review of the S-band antenna amplifier problem and the likely impact of the degradation of performance of these amplifiers in individual satellites on the performance of the constellation as a whole. At that time, based in part on the third-party report, we concluded that, although there was risk, with the addition of the eight spare satellites in 2007, the constellation would continue to provide commercially viable two-way communication services until the next generation satellites begin to be launched in 2009. Based on data recently collected from the satellite operations, **we have concluded that the degradation of the S-band functionality for commercial service is now occurring at a rate that is faster than previously experienced and faster than we had previously anticipated.** In response, in consultation with outside experts, we have implemented innovative methods, and plan to continue to implement additional corrective measures, to attempt to ameliorate this problem, including modifying the

configuration of our constellation as described above, and thereby extend the life of the two-way communication capacity of the constellation. Nonetheless, to date **we have been unable to correct the amplifier problem and may be unable to do so.**

Based on our most recent analysis, we now believe that, if the degradation of the S-band antenna amplifiers continues at the current rate or further accelerates, and if we are unsuccessful in developing additional technical solutions, the quality of two-way communications services will decline, **and by some time in 2008 substantially all of our currently in-orbit satellites will cease to be able to support two-way communications services.** As the number of in-orbit satellites (but not the eight spare satellites scheduled to be launched in 2007) with properly functioning S-band antenna decreases, despite a successful launch and optimized placement in orbit of the eight spare satellites in 2007, increasingly larger coverage gaps will recur over areas in which we currently provide two-way communication services. Subscriber service will continue to be available, but at certain times in any given location it will take substantially longer to establish calls and the average duration of calls may be impacted adversely.

washingtonpost.com

## Satellite Phone Firm Focuses on Crisis Network

Now-Profitable Iridium Plans Deal With MedStar Health

By Chris Kirkham  
Washington Post Staff Writer  
Monday, June 26, 2006; D01

Seven years after the rapid, \$6 billion collapse of its predecessor, Bethesda-based Iridium Satellite LLC is turning a profit on its satellite telephone service as demand for disaster-proof communications grows among government agencies and private businesses.

The company plans to announce today a deal to provide an emergency satellite phone network for MedStar Health, the nonprofit owner of Washington Hospital Center and Georgetown University Hospital. The sale is one of many Iridium Satellite has made since last year's hurricane season when, in the view of Iridium executives, emergency responders "woke up" to the need for a communication service that could let them talk even as cellphone networks and landlines fail.

Iridium relays calls from its handsets across a globe-spanning network of 66 satellites.

The privately held company has reported a profit for five consecutive quarters, according to figures released by the company. For the three months ending March 31, it reported earnings of \$12.6 million, a 73 percent increase from the comparable quarter in 2005.

The company sent thousands of its phones to the Gulf Coast after Hurricane Katrina, when satellite phone traffic surged and federal officials called for creation of a system that would allow emergency workers to more dependably communicate during severe crises.

"What this hurricane proved to everyone is that there are more extreme elements out there than most people wanted to believe or were willing to believe," said Greg Ewert, an executive vice president of Iridium Satellite. "Most people are racing back to review disaster recovery plans, and this marketplace has now opened up to us."

Satellite communication systems are still costly -- MedStar expects its 96-handset system to cost \$300,000 to \$400,000, including phones and service -- and Iridium's goal now is to focus on niche groups that need the services the most. Emergency-response agencies are one example, Ewert said, but the maritime, aviation and petroleum industries are also potentially important markets.

Large marine fishing companies and operators of offshore drilling rigs are customers that cannot risk communication breakdowns, Ewert said. Since the hurricane season, Iridium Satellite also has had inquiries from hotel chains, insurance companies and construction crews.

The company's competitors include California-based Globalstar Telecommunications Ltd.

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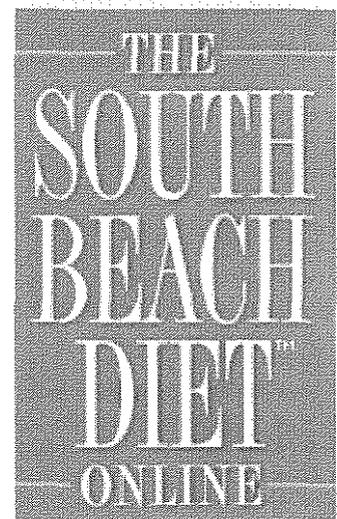
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HEIGHT	WEIGHT
5' 2"	130 - 139 lbs
5' 3"	140 - 149 lbs
5' 4"	150 - 159 lbs
5' 5"	160 - 169 lbs

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Iridium Satellite's predecessor, Iridium LLC, focused on selling individual handsets to global travelers, thinking satellite phones would be a popular alternative to cellphone roaming fees. But the handsets were bulky and the service was expensive.

"I think there were a lot of people who were naive about the demand," said Herschel Shosteck, president and chairman of the Silver Spring-based Shosteck Group, a global communications consulting firm. "What you got was the self-delusion of true believers who thought there was a big market for this stuff, when actually the market is very specialized and constrained."

Iridium filed for bankruptcy in August 1999 after its 66-satellite network failed to attract customers. Silver Spring investment firm Syncom Management Co. and other investors bought the satellites for \$25 million in late 2000 and refashioned the company as Iridium Satellite LLC.

The reborn Iridium initially got back on track by winning a \$72 million Defense Department contract shortly after it was formed. But commercial sales have steadily increased since its inception.

Seventy percent of its \$50.9 million in first-quarter 2006 revenue was from commercial sales, according to the company. Iridium says calls now average about \$1 a minute, less than in the early years.

The company operates as a wholesaler, selling directly only to the Pentagon. Other sales are handled by a network of partner companies. The MedStar deal was organized by Roadpost Inc., an international telecommunications broker.

Disaster recovery has not been the only impetus for Iridium Satellite's growth. Ewert said the technology also is used to track shipping containers or weather patterns.

The growth in global satellite communications is expected to continue, analysts say.

"Right now the satellite is being deemed as a sort of communication insurance," said Patti Reali, a Pennsylvania-based research director for Gartner Dataquest. "They're the only companies that work over the poles and over the oceans, so they have a key market they're able to target."

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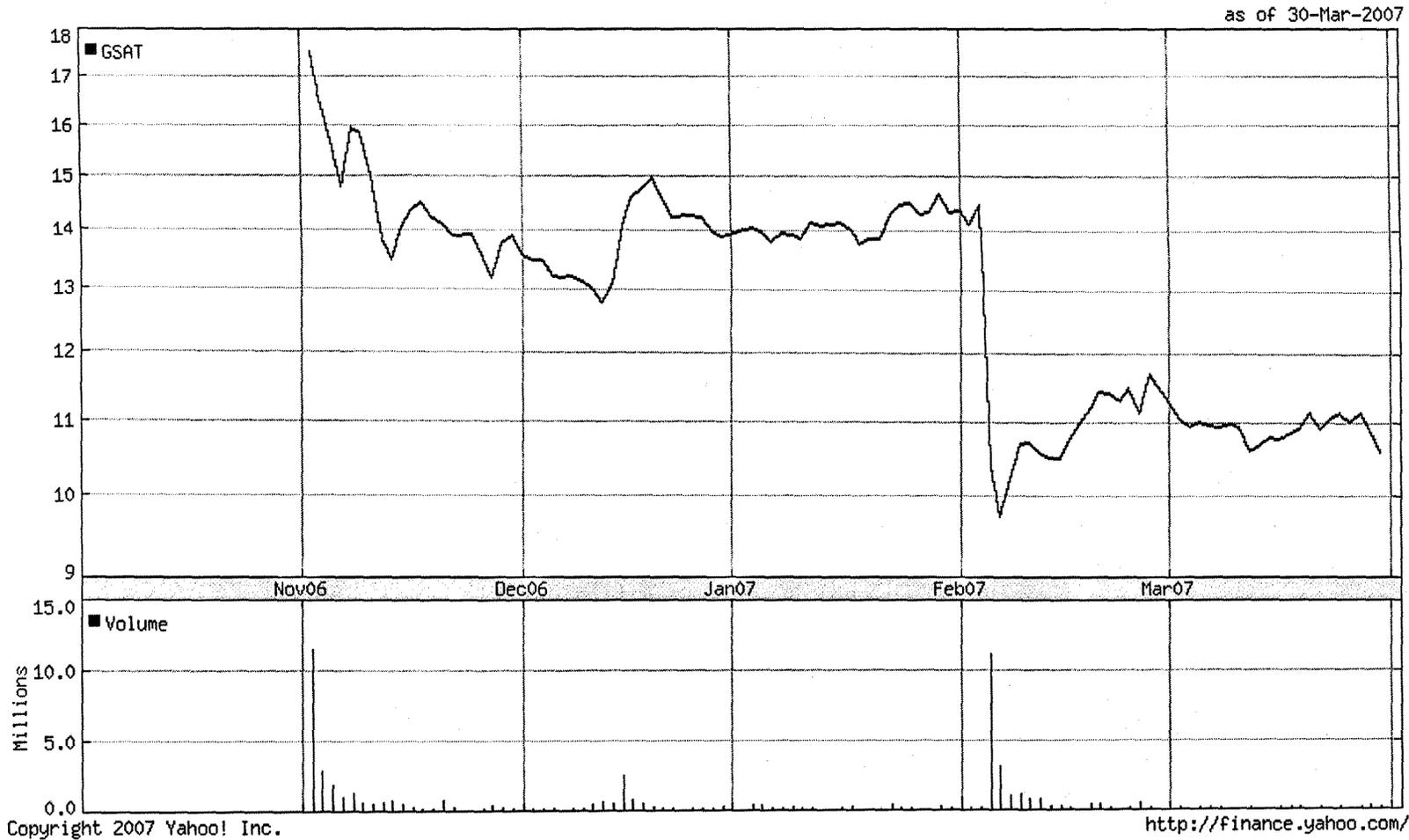
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Change:	<b>↓ 0.09 (0.85%)</b>	Volume:	235,099
Prev Close:	10.60	Avg Vol (3m):	487,910
Open:	10.60	Market Cap:	763.03M
Bid:	9.59 x 500	P/E (ttm):	28.48
Ask:	N/A	EPS (ttm):	0.37

1y Target Est: 18.25

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